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Attorneys for Defendants  
 CITY OF LOS ANGELES, LOS ANGELES POLICE DEPARTMENT,  
 DETECTIVE R. ULLEY and DETECTIVE J. VANDER HORCK

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

MARCO MILLA an individual,  
  
 Plaintiff,

v.

CITY OF LOS ANGELES a municipal  
 entity; LOS ANGELES POLICE  
 DEPARTMENT, a municipal entity;  
 DETECTIVE R. ULLEY AND  
 DETECTIVE J. VANDER HORCK, and  
 DOES 1 through 100, inclusive,  
  
 Defendants.

Case No. 16-cv-00134-FWS-MRW

**REVISED JOINT WITNESS LIST**

PTC: May 12, 2023  
 TIME: 9:00 a.m.  
 DEPT: Courtroom 10D  
 JUDGE: Hon. Fred W. Slaughter  
 TRIAL: May 16, 2023

The parties hereby submit the following Revised Joint Witness List.

**PLAINTIFF'S WITNESS LIST**

	<b>Witness</b>	<b>Expected Testimony</b>	<b>Direct</b>	<b>Cross</b>
1	Richard Ulley	Defendant	2.0	1.5
2	John Vander Horck	Defendant (depo)	2.0	1.0
3	Mark Maldonado	Officer who provided info to defendants	1.0	.75
4	Marco Milla	Plaintiff	3.0	1.5
5	Celedonio "Alex Velarde	Alibi witness	1.0	0.3
6	Irma Navarro	Alibi witness	.5	0.3
7	Peter Burke	Deputy DA	.3	0.3
8	Scott Carbaugh (Filing Deputy)	Filing Deputy DA	1.0	0.3
9	Honorable Olivia Rosales	Deputy DA	.3	0.5
10	Steven Strong	Plaintiff's expert on police practices	2.0	.75
11	Marvina Strong	Withdrawn	0	0.1
12	Mitchell L. Eisen, Ph.D.	Plaintiff's expert on line ups	2.0	0.5
13	Maria Flores	Witness to shooting	1.0	0.1
14	Ramar Jenkins	Witness to shooting (depo or in person)	2.0	1.0
15	Freddy Sepulveda	Plaintiff's brother	.5	0.1
16	Rosalina Sepulveda	Plaintiff's mother	.5	0.1

	<b>Witness</b>	<b>Expected Testimony</b>	<b>Direct</b>	<b>Cross</b>
17	Judith Reif Pettigrew, Deputy District Attorney	DA who reviewed the habeus issues and Vander Horck conduct	1.0	0.1
18	Therese Moriarty, PSY.D	Plaintiff's neuropsych expert	2.0	0.5
19	Deputy D.A. Frank Santoro	DA who rejected case refiling	.5	0.2
20	Salvador Pimentel	Percipient witness	2.0	0.5

### **DEFENDANTS' WITNESS LIST**

	<b>Witness</b>	<b>Expected Testimony</b>	<b>Direct</b>	<b>Cross</b>
1	Detective David Lott	Conducted initial investigation on the night of the shooting.	0.5	.75
2	Richard Ulley	Defendant in this case. Will testify to the investigation into this matter, identification processes, presentation of case to District Attorney, working with DA's office during prosecution, responses to discovery.	SEE ABOVE	
3	John Vander Horck Deceased – presented via deposition	Defendant in this case. Will testify to the investigation into this matter, identification processes, presentation of case to District Attorney, working with DA's office during prosecution, compliance with discovery.	SEE ABOVE	
4	Mark Maldonado	A gang expert on 204th St. Gang, provided list of possible suspects based upon his expected testimony of the 204th St. Gang and its members, provided information for court about the gang and why gang members commit crimes of these types.	SEE ABOVE	

	<b>Witness</b>	<b>Expected Testimony</b>	<b>Direct</b>	<b>Cross</b>
5	Scott Carbaugh, LA County District Attorney's Office or through counsel James Jardin, Collins, Collins, Muir and Stewart	Area of Expected testimony Filing DA on the under lying case.	SEE ABOVE	
6	Peter Berke* LA County District Attorney's Office or through counsel James Jardin, Collins, Collins, Muir and Stewart	Initially assigned to handle underlying criminal case. A letter regarding discovery was addressed to him.	SEE ABOVE	
7	Hon. Oliva Rosales Los Angeles Superior Court, Dept. M, Norwalk Courthouse 12720 Norwalk Blvd., Norwalk, CA 90650 or through counsel James Jardin, Collins, Collins, Muir and Stewart	Subsequently assigned to handle underlying criminal case. Has expected testimony regarding discovery in case (and underlying orders and disclosure); witnesses; identification issues; independent prosecutorial evaluation of case; facts adduced at trial; defenses proffered or not proffered such as alibi; information on a booking photo being obtained outside of the regular discovery channels; information regarding new trial and investigation of witnesses for new trial.	SEE ABOVE	
8	Michael Deck* LA District Attorney's Office	DAI during motion for new trial.	0.3	.5
9	Curtis McClean* LA District Attorney's Office	DAI during habeas proceedings.	0.3	.5

	<b>Witness</b>	<b>Expected Testimony</b>	<b>Direct</b>	<b>Cross</b>
10	Bruce Brown* District Attorney for the Fifth District, Clear Creek County District Attorney's Office, P.O. Box 2000, Georgetown, CO 80444; Phone: 303-679-2316	Retained by Milla to handle underlying criminal case. Hired investigator to aid in defense; received information on other witnesses, alibi witnesses and other potential suspects. Has expected testimony regarding discovery in case (and underlying orders and disclosure); witnesses; identification issues; facts adduced at trial; defenses proffered or not proffered such as alibi; Refutes contentions that he failed to investigate or offered ineffective assistance of counsel.	0.3	.5
11	Larry Rivera* Last known address in court files for Clueso Investigations which is in Plaintiff's possession	Investigation of case and contact with witnesses.	0.3	.5
12	Marco Milla, Plaintiff in case, known to counsel	His alibi, disclosure of information to police and damages.	SEE ABOVE	
13	Sandra Jauregui* Last known address is in Bellflower and apparently known to Plaintiff	Knowledge of statement of the actual shooter on the evening of the incident; her reasons for not providing such information to the police; her declaration and testimony at the hearing on a motion for new trial.	0.3	

	<b>Witness</b>	<b>Expected Testimony</b>	<b>Direct</b>	<b>Cross</b>
14	Irma Navarro* Last known address is unknown. Plaintiff's subsequent disclosures gave an address which was Plaintiff's former address	Knowledge of statement of the actual shooter on the evening of the incident; her reasons for not providing such information to the police; her declaration and testimony at the hearing on a motion for new trial.	SEE ABOVE	
15	Alex Velarde* Last known address unknown, possibly in Santa Fe Springs	His various statements of alibi for Plaintiff and knowledge of information about persons who came to Jauregui's apartment on the night/early next morning of the shooting.	SEE ABOVE	
16	Salvador Pimentel* Last known address, California State Prison	His knowledge that someone other than Milla did the shooting; information on disclosure of Munoz saying Munoz did the shooting; his failure to alert police to this information.	SEE ABOVE	
17	Ramar Jenkins Last known address California State Prison	Witness to the crime; victim of shooting; identification process outside of court and inside the court room.	SEE ABOVE	
18	Erica Hightower* Last known address in Gardena	Witness to the crime; victim of shooting; identification process outside of court and inside the court room.	0.2	.5
19	Traci McCombs* Last known address in Murder Book which is in Plaintiff's possession	Witness to the crime; victim of shooting; identification process outside of court and inside the court room.	0.2	.5

	Witness	Expected Testimony	Direct	Cross
20	Richard Marks* Address on expert report.	His expert analysis of the criminal investigation, compliance with training and objectively reasonable police investigations; <i>Monell</i> issues and other opinions as stated in his expert report.	1.0	.5
21	Dr. Ted Evans, address on expert report	His interview of plaintiff, evaluation of plaintiff for psychological/psychiatric effects of the incident upon him; results and corroboration of standard psychological/psychiatric testing as part of his evaluation and opinion.	1.0	2.0
22	Dan Jenks, address provided to counsel during deposition.	Various PMKs from Los Angeles Police Department regarding <i>Monell</i> issues as the <i>Monell</i> issues are further defined or refined.	1.5	2.0
23	Various PMKs from LAPD	Regarding <i>Monell</i> issues as the <i>Monell</i> issues are further defined or refined.	1.0	1.0

Dated: May 10, 2023

**LAW OFFICE OF MARTIN STANLEY**By: /s/ Martin Stanley

Martin Stanley  
Attorney for Plaintiff  
MARCO MILLA

Dated: May 10, 2023

**ORBACH HUFF + HENDERSON LLP**By: /s/ Kevin E. Gilbert

Kevin E. Gilbert  
Carolyn M. Aguilar  
Attorneys for Defendants  
CITY OF LOS ANGELES, LOS ANGELES  
POLICE DEPARTMENT, DETECTIVE R.  
ULLEY and DETECTIVE J. VANDER HORCK